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6 Attorneys for Defendant  
RICH PHARMACEUTICALS, INC.

7  
8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA

10  
11 **Biosuccess Biotech, Co. Ltd.,**

12 Plaintiff;

13 v.

14 **Rich Pharmaceuticals, Inc.,** a Nevada  
Corporation formerly known as Nepia,  
15 Inc., **Imagic, LLC,** a California LLC,  
**Richard L. Chang Holdings, LLC,** a  
16 New Jersey LLC, **Ben Chang,** an  
individual, **and Does 1 through 10,**  
17 inclusive,

18 Defendants.  
19

**Case No. 2:14-cv-00310 JAK (ANx)**

**STIPULATION TO TO SET ASIDE ENTRY  
OF DEFAULT AGAINST DEFENDANT RICH  
PHARMACEUTICALS, INC.**

**STIPULATION TO SET ASIDE ENTRY OF DEFAULT**

This Stipulation is entered into between Plaintiff Plaintiff Biosuccess Biotech, Co., Ltd. (“Plaintiff”) and Defendant Rich Pharmaceuticals, Inc. (“Defendant”) by their respective counsel.

**RECITALS**

A. Plaintiff filed, and was granted, Default by Clerk pursuant to Rule 55(a) of the Federal Rules of Civil Procedure against Defendant on February 28, 2014, as amended. (Dkt. Nos. 18 and 19).

B. Defendant’s agent for service of process in Nevada failed to provide a copy of the summons and complaint to Defendant and failed to provide any notice that Defendant had been served on January 21, 2014.

C. Defendant received a copy of the complaint through counsel, and Defendant provided insurance counsel with the summons and complaint.

D. Some confusion occurred about whether insurance counsel was filing a response to the Complaint.

E. No notice was given to undersigned counsel for Defendant of any impending default, and said counsel discovered the default on March 19, 2014 via a search on the PACER system.

F. To avoid unnecessary motion practice, each party desires that entry of default against Defendant be withdrawn, and that Defendant be served and allowed to respond to Complaint.

**STIPULATION**

1. Plaintiff and Defendant agree to set aside the entry of default, with each party to bear its own fees and costs, and accordingly, jointly and respectfully request that, for good cause, this Court enter an order setting aside the Default by Clerk entered on February 28, 2014; and,

2. Plaintiff and Defendant agree that Defendant will file a responsive pleading or motion to Plaintiff’s Complaint on April 2, 2014.

**IT IS SO STIPULATED:**

Dated: March 26, 2014

LEE TRAN & LIANG LLP  
By: /s/ Enoch Liang  
Enoch Liang  
Heather Ayang

Attorneys for Plaintiff  
BIOSUCCESS BIOTECH, CO., LTD.

Dated: March 26, 2014

ENTREPRENEUR LAW GROUP LLP  
By: /s/ Jack Russo  
Jack Russo  
Christopher Sargent

Attorneys for Defendants  
RICH PHARMACEUTICALS, INC.

Entrepreneur Law Group LLP